

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ROBERT FLETCHER and BARTLOW  
GALLERY LTD.,

*Plaintiffs,*

- against -

PETER DOIG, GORDON VENEKLASEN,  
MATTHEW S. DONTZIN and THE DONTZIN  
LAW FIRM LLP,

*Defendants.*

Case No. 1:13-cv-03270

Hon. Gary S. Feinerman, U.S.D.J.

**DEFENDANTS' MOTION FOR STATUS CONFERENCE**

Defendants Peter Doig, Gordon Veneklasen, Matthew S. Dontzin, and the Dontzin Law Firm LLP (collectively, "Defendants") respectfully submit this Motion for a status conference regarding their October 21, 2016 Sanctions Motion (the "Pending Sanctions Motion") (Dkt. No. 273) and September 22, 2016 Bill of Costs (the "Bill of Costs") (Dkt. No. 262.). In support, Defendants state:

1. This Court conducted a bench trial on the merits in this matter in August 2016, following which it denied all of Plaintiffs' claims.

2. On September 22, 2016, Defendants, as the prevailing parties, filed their Bill of Costs for the recovery of \$66,624.04 in litigation expenses. (Dkt. No. 262.).

3. On June 14, 2017, the Court heard argument on the Pending Sanctions Motion. (Dkt. No. 312.).

4. On March 11, 2020, this Court held a hearing on *Defendants' Motion Directing Plaintiff Fletcher to Update His Address with the Court and for a Status Conference Regarding Their Pending Sanctions Motion and Bill of Costs*. (Dkt. Nos. 361, 363.). At that hearing, the Court

scheduled a further status hearing for April 21, 2020, but indicated that it anticipated ruling before then. *See* Tr. of Proc. (Mar. 11, 2020) at 7:3–10 (“Please know that it is top of mind, and it’s not something that has gotten lost in the shuffle. It’s just something that I have been weighing very seriously, and that is -- that is the reason for the delay. So, why don’t we set this for a status hearing, Jackie. Why don’t we say the week of April 20th. Okay? And hopefully, I will strike that status because I will have ruled on everything.”).

5. Recognizing that the Court has many demands on its time, Defendants respectfully submit that adjudication of their Pending Sanctions Motion and Bill of Costs should be delayed no further.

WHEREFORE, Defendants respectfully request that the Court schedule a conference by Zoom or telephone with Counsel regarding the status of the Pending Sanctions Motion and Bill of Costs. Alternatively, Defendants respectfully request that the Court grant their Pending Sanctions Motion and enter the Bill of Costs with interest from November 3, 2016 (*i.e.*, the date it was fully briefed).

Dated: October 13, 2021

Respectfully Submitted,

By: /s/ Suyash Agrawal  
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